

1 Steve W. Berman (*Pro Hac Vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
3 Telephone: (510) 725-3000
Facsimile: (510) 725-3001
4 steve@hbsslaw.com

5 Elizabeth J. Cabraser (083151)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
6 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
7 Telephone: (415) 956-1000
Facsimile: (415) 956-1008
8 ecabraser@lchb.com

9 Adam J. Zapala (245748)
COTCHETT, PITRE & McCARTHY, LLP
10 840 Malcolm Road
Burlingame, CA 94010
11 Telephone: (650) 697-6000
Facsimile: (650) 697-0577
12 azapala@cpmlegal.com

13 *Counsel for Indirect Purchaser Plaintiffs*

14 [Additional Counsel Listed on Signature Page]

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION

Case No. 13-MD-02420 YGR (DMR)

20 MDL No. 2420

21
22 This Documents Relates to:

FURTHER SUPPLEMENTAL STATUS
REPORT ON SETTLEMENT
DISTRIBUTION

23 ALL INDIRECT PURCHASER ACTIONS
24
25
26
27
28

DATE ACTION FILED: Oct. 3, 2012

On March 17, 2023 (ECF No. 2763), Indirect Purchaser Plaintiffs (Plaintiffs) committed to filing an updated proposal for distribution with the Court by March 24, 2023. Plaintiffs now respectfully request an additional two weeks to file the plan, so that they may complete an audit of the various settlement accounts before presenting the distribution plan to the Court.

As the Court is aware, Plaintiffs reached settlements over time with multiple defendants. Those settlement proceeds have been, appropriately, segregated in different accounts with Citibank, which have accrued interest separately. Additionally, as the Court is aware, the proceeds must be allocated differently amongst the two different classes (Sony settlement class versus the more limited class that participates in all settlements) as well as between repealer and non-repealer states. While Plaintiffs have been working diligently to complete this process, tying out and triple-checking the numbers is taking more time than usual, due to the number of accounts and the complexity of the distribution.

Plaintiffs want to ensure that the numbers submitted with the distribution plan to the Court are final and take into account the complexities involved in the multiple settlements and distribution. Accordingly, Plaintiffs respectfully submit they will file the proposed plan of distribution on April 7, 2023.

DATED: March 24, 2023

HAGENS BERMAN SOBOL SHAPIRO LLP

By s/ Shana E. Scarlett
 SHANA E. SCARLETT
 Steve W. Berman (*pro hac vice*)
 Benjamin J. Siegel (256260)
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 steve@hbsslaw.com
 shanas@hbsslaw.com
 bens@hbsslaw.com

DATED: March 24, 2023

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By s/ Brendan P. Glackin
 BRENDAN P. GLACKIN
 Elizabeth J. Cabraser (SBN 083151)

Brendan P. Glackin (199643)
Lin Y. Chan (SBN 255027)
Michael K. Sheen (288284)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
ecabraser@lchb.com
bglackin@lchb.com
lchan@lchb.com
msheen@lchb.com

DATED: March 24, 2023

COTCHETT, PITRE & McCARTHY, LLP

By s/ Adam J. Zapala
ADAM J. ZAPALA

Joseph W. Cotchett (SBN 36324)
Tamarah P. Prevost (SBN 313422)
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
jcotchett@cpmlegal.com
azapala@cpmlegal.com
tprevost@cpmlegal.com

Counsel for Indirect Purchaser Plaintiffs